

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

ORIGINAL
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AUG 15 2005
Illinois Commerce Commission
RAIL SAFETY SECTION

Illinois Central Railroad Company,

Petitioner,

v.

Neoga Township, the City of Neoga and the State of Illinois,
Department of Transportation,

T05-0007

Respondents.

Petition of Illinois Central Railroad Company seeking an order of closure of the at-grade crossings of Cemetery Road/ TR-67 (DOT 289 160P; railroad milepost 185) and TR-85 (DOT 289 161W; railroad milepost 185.65) and the Illinois Central Railroad Company's tracks, and an order of installation of automatic flashers and gates at the crossing of TR-85A (DOT 289 162D; railroad milepost 186.16) and the Illinois Central Railroad Company's tracks, all in Neoga Township, Cumberland County, Illinois.

**INITIAL INTERROGATORIES TO
RESPONDENT CITY OF NEOGA**

TO: Neoga Township:

Ms. Doris McKay
Clerk, Neoga Township
88 County Road 1400N
Neoga, Illinois 62447

Illinois Central Railroad Company ("IC") requests that Respondent Neoga Township ("Township") answer, under oath and in writing signed by an authorized representative of the City within 28 days of service, the following written interrogatories, serving the responses on counsel herein in accordance with the rules of the Illinois Commerce Commission.

INTERROGATORY NO. 1 Please give the most recent ADT you have for TR-67, TR-85 and TR-85A, including any breakdowns you have by vehicle type.

DOCKETED

AUG 16 2005

INTERROGATORY NO. 2: What was the total maintenance budget for township roads in 2004, and what was the source of funds to satisfy the budget?

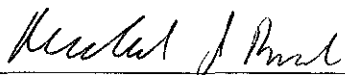
INTERROGATORY NO. 3: What is the total mileage of roads which the Township maintained in 2004?.

THESE INTERROGATORIES ARE INTENDED TO BE CONTINUING TO THE FULLEST EXTENT CONTEMPLATED BY THE RULES OF THE ILLINOIS COMMERCE COMMISSION. PETITIONER IS ASKED TO UPDATE RESPONSES REASONABLY AS ADDITIONAL INFORMATION BECOMES KNOWN TO IT (OR TO ITS AGENTS, INCLUDING ITS LAWYER(S)) AND WITHOUT THE NECESSITY OF IC MAKING ANY FURTHER REQUEST.

Dated: August 11th, 2005

Respectfully submitted,

ILLINOIS CENTRAL RAILROAD COMPANY

By 

Michael J. Barron, Jr.

Counsel

CN

17641 S. Ashland Avenue

Homewood, IL 60430

Phone: 708-332-3954

Fax: 708-332-3052

ARDC 6228809

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ILLINOIS COMMERCE COMMISSION

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NOTICE OF SERVICE OF INITIAL INTERROGATORIES

Ms. Doris McKay
Neoga Township, Clerk
88 County Road 1400 N
Neoga, IL 62447

Mr. Ben Bland
Cumberland County Highway Engineer
800 East Industrial Drive
Toledo, IL 62468

Mr. Lloyd A. Lacy
Neoga Township, Supervisor
590a County Road 750N
Neoga, IL 62447

Mr. Carl M. Webber
Webber & Thies, P.C.
202 Lincoln Square
Urbana, IL 61801

Mr. David D. Johnston
Neoga Township Highway Commissioner
608 County Road 1000 N
Neoga, IL 62447

Mr. Jay Russel
City of Neoga, Mayor
P.O. Box 248
Neoga, IL 62447-0248

Mr. Victor A. Modeer
Director of Highways, IDOT
ATTN: JEFF HARPRING, ROOM 205
2300 South Dirksen Parkway
Springfield, IL 62764

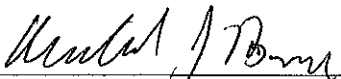
Mr. Michael Stead
Rail Safety Program Administrator
Illinois Commerce Commission
527 E. Capital Avenue
Springfield, IL 62701

Ms. Ellen Schanzle-Haskins
Chief Counsel
Illinois Department of Transportation
2300 S. Dirksen Parkway
Springfield, IL 62764

David Lazarides
Illinois Commerce Commission
527 E. Capitol Avenue
Springfield, IL 62701

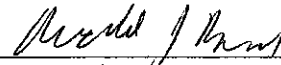
PLEASE TAKE NOTICE that we have on this 11th day of August, 2005, served on Neoga Township our Initial Interrogatories to Respondent Neoga Township, a copy of which is hereby served upon you.

ILLINOIS CENTRAL RAILROAD COMPANY

By 
Michael J. Barron, Jr.
Counsel
CN
17641 S. Ashland Avenue
Homewood, IL 60430
Phone: 708-332-3954
Fax: 708-332-3052
ARDC 6228809

CERTIFICATE OF SERVICE

I, MICHAEL J. BARRON, JR., an attorney, certify that I served the foregoing Initial Interrogatories to Respondent Neoga Township upon the those made parties to this proceeding by enclosing copies of the foregoing in envelopes addressed to the parties as set forth below, postage prepaid, and depositing the envelopes in the United States Mail at 17641 S. Ashland Avenue, Homewood, IL on the 11th day of August, 2005.


Michael J. Barron, Jr.

Mr. Carl M. Webber
Webber & Thies, P.C.
202 Lincoln Square
Urbana, IL 61801

Mr. Ben Bland
Cumberland County Highway Engineer
800 East Industrial Drive
Toledo, IL 62468

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